



FEDERAL ELECTION COMMISSION
Washington, DC 20463

FEB 20 2007

Cleta Mitchell, Esq.
Foley & Lardner LLP
3000 K Street, N.W., Suite 500
Washington, D.C. 20007-5143

RE: MUR 5645
Santorum 2006 and Gregg R. Melinson,
in his official capacity as treasurer

Dear Ms. Mitchell:

On March 15, 2006, Santorum 2006 and its treasurer ("Committee") were notified that the Federal Election Commission found reason to believe that the Committee violated 2 U.S.C. §§ 441b(a) and 434(b)(3)(A). On June 9, 2006, you submitted a response to the Commission's reason to believe findings on behalf of the Committee. After considering the circumstances of the matter, the Commission determined on February 8, 2007, to take no further action and close the file as it pertains to Santorum 2006 and Gregg Melinson, in his official capacity as treasurer. However, the Commission has determined in this matter that the Committee was the beneficiary of \$7,938.81 in in-kind corporate contributions. Because the prohibited source, Highmark Inc., waived its rights to refunds of the contributions, the Committee should disgorge \$7,938.81 to the U.S. Treasury by sending a check, made payable to the U.S. Treasury and referencing MUR 5645, to the following address within 30 days:

Federal Election Commission
Office of General Counsel
999 E Street, N.W.
Washington, D.C. 20463

You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect, and that this matter is still open with respect to other respondents. The Commission will notify you when the entire file has been closed.

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If you have any questions, please contact me at (202) 694-1650.

Sincerely,

A handwritten signature in black ink that reads "Mark Allen". The signature is written in a cursive style with a large initial "M" and a long, sweeping underline.

Mark Allen
Attorney

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